

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Martha Wartenluft	:	Chapter 13
Debtor	:	
	:	Case no 22-12760-pmm
	:	
Nationstar Mortgage LLC	:	
Movant	:	
Vs.	:	
	:	
Martha Wartenluft	:	
And	:	
Scott M. Waterman, Esquire	:	
Respondent	:	
	:	

ANSWER TO MOTION
FOR RELIEF FROM THE AUTOMATIC STAY

Respondent, Martha Wartenluft, by and through her undersigned counsel, Michael J. McCrystal, Esquire answer the Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
4. Denied as a Conclusion of Law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent, that an answer is required, this averment is strictly denied.
5. Denied as stated, at the time of the hearing on the merits on this motion, debtor is or will be current.
6. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
7. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.

8. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
9. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
10. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
11. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
12. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
13. 13. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.

WHEREFORE, Debtor prays this Honorable Court to deny the relief requested and for such other and further relief as this Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire
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